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# Transcript of Jeffrey Green

**Date:** February 22, 2025

**Case:** Headwater Research LLC -v- Samsung Electronics Co, Ltd, et al.

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2 (5 to 8)

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| <p>5</p> <p>1 PROCEEDINGS</p> <p>2 VIDEOGRAPHER: Here begins Media Number 1</p> <p>3 in the videotaped deposition of Jeff Green in the</p> <p>4 matter of Headwater Research, LLC v. Samsung</p> <p>5 Electronics Company Limited, et al, in the United</p> <p>6 States District Court for the Eastern District of</p> <p>7 Texas, Marshall Division, Case Number</p> <p>8 2:23-CV-00641.</p> <p>9 Today's date is February 22, 2025. The</p> <p>10 time on the video monitor is 10:01. The remote</p> <p>11 videographer today is John Gugarty representing</p> <p>12 Planet Depos. All parties of this video</p> <p>13 deposition are attending remotely.</p> <p>14 Would counsel please voice-identify</p> <p>15 themselves and state whom they represent?</p> <p>16 MR. LAKE: Steffen Lake on behalf of</p> <p>17 Samsung.</p> <p>18 MR. KROEGER: Paul Kroeger on behalf of</p> <p>19 plaintiff Headwater and the witness, Mr. Green.</p> <p>20 VIDEOGRAPHER: The court reporter today is</p> <p>21 Susan Klinger also representing Planet Depos. The</p> <p>22 witness will now be sworn.</p> <p>23 JEFFREY GREEN,</p> <p>24 having been first duly sworn testified as follows:</p> <p>25 EXAMINATION</p> | <p>7</p> <p>1 A Have I offered, no, I've not been to a</p> <p>2 trial.</p> <p>3 Q I apologize, have you ever testified at</p> <p>4 trial before?</p> <p>5 A No.</p> <p>6 Q So I'm sure you are starting to get the</p> <p>7 hang of this deposition procedure a little bit by</p> <p>8 now, but do you mind if we just run through the</p> <p>9 preliminaries to make sure we're on the same page</p> <p>10 for today?</p> <p>11 A Sure.</p> <p>12 Q So you understand that you're testifying</p> <p>13 under oath and under the penalty of perjury in the</p> <p>14 United States?</p> <p>15 A I do.</p> <p>16 Q The same as if you were testifying live in</p> <p>17 a United States courtroom, correct?</p> <p>18 A Correct.</p> <p>19 Q If at any point today you don't fully</p> <p>20 understand a question that I'm asking, will you</p> <p>21 let me know and give me an opportunity to rephrase</p> <p>22 that question?</p> <p>23 A Sure.</p> <p>24 Q So then is it fair that if you do answer a</p> <p>25 question, I can assume that you understood the</p>   |
| <p>6</p> <p>1 BY MR. LAKE</p> <p>2 Q Good morning, Mr. Green.</p> <p>3 A Good morning.</p> <p>4 Q Could you please start by stating your</p> <p>5 full name for the record?</p> <p>6 A Yeah, Jeffrey Martin Green.</p> <p>7 Q And who is your current employer,</p> <p>8 Mr. Green?</p> <p>9 A My current employer is a company called</p> <p>10 Arctic Wolf.</p> <p>11 Q And where is your primary residence?</p> <p>12 A Nashville, Tennessee.</p> <p>13 Q And I know that you have taken at least or</p> <p>14 you have sat for at least one deposition before</p> <p>15 because I took that one, but have you had any</p> <p>16 other depositions besides that?</p> <p>17 A I've had a second deposition, yes.</p> <p>18 Q In what case was your other deposition?</p> <p>19 A It was a case with AT&amp;T and Verizon.</p> <p>20 Q Could you briefly describe the general</p> <p>21 subject matter of your deposition?</p> <p>22 A It was around a patent, if I'm recalling</p> <p>23 correctly, around the service design center.</p> <p>24 Q Have you ever offered testimony at a</p> <p>25 trial?</p>  | <p>8</p> <p>1 question?</p> <p>2 A Yes.</p> <p>3 Q On behalf of our court reporter today, I</p> <p>4 will just ask that you give a verbal answer for</p> <p>5 all of my questions. Sometimes it is normal to</p> <p>6 give a head nod or an uh-huh answer, but it will</p> <p>7 be easier on our reporter if you could just give a</p> <p>8 clear, verbal answer to each question; is that</p> <p>9 fair?</p> <p>10 A Yes.</p> <p>11 Q And on that tone for our court reporter,</p> <p>12 let's both do our best to not talk over one</p> <p>13 another. I will do my best to let you finish your</p> <p>14 answer completely before I begin my next question,</p> <p>15 and I would ask that you let me complete my</p> <p>16 question before starting to answer. Does that</p> <p>17 sound okay?</p> <p>18 A Yes.</p> <p>19 Q I will try to give you a break about every</p> <p>20 hour or so, but if you need one for any other</p> <p>21 reason, please let me know and I can try to make</p> <p>22 room for one as soon as possible. But I will just</p> <p>23 note that if there is a question pending I will</p> <p>24 need an answer for that question before we can go</p> <p>25 to a break.</p> |

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| <p>17</p> <p>1 unless I was -- I was required to do so.</p> <p>2 Q So you would prefer not to; is that fair?</p> <p>3 A I have -- I have a very demanding job and</p> <p>4 it keeps me extremely busy.</p> <p>5 Q That is completely understandable.</p> <p>6 So I understand you are being represented</p> <p>7 by Headwater's lawyers from the law firm of Russ</p> <p>8 August &amp; Cabot today; is that correct?</p> <p>9 A That is correct.</p> <p>10 Q How did you come to be represented by the</p> <p>11 law firm of Russ August?</p> <p>12 A I had a discussion with Paul sometime back</p> <p>13 -- I forget the timeline and, you know, decided to</p> <p>14 let them represent me instead of, you know,</p> <p>15 finding other counsel.</p> <p>16 Q Did you consider finding other counsel to</p> <p>17 represent you?</p> <p>18 A No.</p> <p>19 Q Are you paying your lawyers to represent</p> <p>20 you during this testimony?</p> <p>21 A I am not.</p> <p>22 Q Do you know who is paying your lawyers?</p> <p>23 A I do not, no.</p> <p>24 Q Would it surprise you if Headwater was</p> <p>25 paying your lawyers to represent you today?</p>   | <p>19</p> <p>1 A There it was really defining, like, the</p> <p>2 roadmap. Defining the features and releases</p> <p>3 with -- with the product management folks.</p> <p>4 Q Could you briefly describe for me what you</p> <p>5 mean by product roadmaps?</p> <p>6 A Yeah. A roadmap is a set of releases</p> <p>7 that, you know, would have groupings of features</p> <p>8 in them that we would be aiming to deliver, you</p> <p>9 know, either on the platform or either on the</p> <p>10 handset.</p> <p>11 Q When you distinguish between a handset and</p> <p>12 -- I'm sorry, I have forgotten to open up the</p> <p>13 realtime transcript. Can you remind what that</p> <p>14 other word was you used?</p> <p>15 A I used the word platform.</p> <p>16 Q Could you describe for me the distinction</p> <p>17 between platform and handset?</p> <p>18 A Typically we refer to the software, you</p> <p>19 know, that goes on an Android device to -- to</p> <p>20 perform the functions that -- that they needed to</p> <p>21 perform in terms of, you know, managing data and</p> <p>22 so on and so forth and voice, et cetera. We refer</p> <p>23 to that as the handset, but you could think of it</p> <p>24 as a mobile phone.</p> <p>25 The platform was, you know, back-end some</p> |
| <p>18</p> <p>1 A I don't know the arrangement they have to</p> <p>2 be honest whether they're being paid by Headwater</p> <p>3 or on contingency or something. I don't honestly</p> <p>4 know, so...</p> <p>5 Q If I recall correctly in your last</p> <p>6 deposition you testified that you were employed by</p> <p>7 ItsOn from October of 2010 through March of 2013;</p> <p>8 is that correct?</p> <p>9 A I believe that's correct, yes.</p> <p>10 Q And did you have a particular position or</p> <p>11 a particular title while working at ItsOn?</p> <p>12 A Yeah, I was running the engineering team</p> <p>13 and product management team at the time.</p> <p>14 Q Were you working in both of those roles</p> <p>15 simultaneously?</p> <p>16 A Yes.</p> <p>17 Q What were your roles for each of those</p> <p>18 positions? We can start with engineering team.</p> <p>19 A For the engineering team, you know, I was</p> <p>20 working with engineers to facilitate the building</p> <p>21 of the product, you know, coding the product,</p> <p>22 testing the product. The usual kind of</p> <p>23 engineering-type responsibilities.</p> <p>24 Q And what were your roles as manager of the</p> <p>25 product management team?</p> | <p>20</p> <p>1 servers where the server software was running that</p> <p>2 communicated with the mobile device, the handset.</p> <p>3 Q And did you have distinct teams of</p> <p>4 engineers that would work on either the handset</p> <p>5 side or the platform side?</p> <p>6 A We did, yes. We had a server team and a</p> <p>7 handset client team.</p> <p>8 Q And those teams consisted of engineers?</p> <p>9 A They did, yes.</p> <p>10 Q Do you have any familiarity with a</p> <p>11 gentleman by the name of Andre Iancu? That is</p> <p>12 spelled I-a-n-c-u.</p> <p>13 A That name isn't familiar to me, that I</p> <p>14 recall.</p> <p>15 Q Do you have any familiarity with a</p> <p>16 gentleman by the name of Jonathan Kagan,</p> <p>17 K-a-g-a-n?</p> <p>18 A I'm not familiar. I don't recall anyone</p> <p>19 by that name.</p> <p>20 Q Do you have any familiarity with a</p> <p>21 gentleman by the name of Roger Sippl, S-i-p-p-l?</p> <p>22 A I have met Roger Sippl, yes.</p> <p>23 Q In what context did you meet Mr. Sippl?</p> <p>24 A I got introduced to him by Greg Raleigh.</p> <p>25 Roger was, I believe, an investor in ItsOn. I'm</p>   |